

**AMOS**  
**VS**  
**THE LAMPO GROUP LLC, et al.**

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**DAVID RAMSEY**

**June 21, 2023**



**Lindsey Perry, LCR,RPR, CRR**

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1                   IN THE UNITED STATES COURT  
2                   FOR THE MIDDLE DISTRICT OF TENNESSEE  
3                   AT NASHVILLE

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4                   BRAD AMOS,

5                   Plaintiff,

6                   vs.

Case No.  
3:21-cv-00923

7                   THE LAMPO GROUP, LLC and  
DAVE RAMSEY,

8                   Defendants.

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14                   Video/Videoconference Deposition of:

15                   DAVID RAMSEY

16                   Taken on behalf of Plaintiff  
June 21, 2023

17                   Commencing at 10:09 a.m.

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1 A P P E A R A N C E S  
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3

4 For the Plaintiff:

5 MR. JONATHAN A. STREET  
6 MS. LAUREN IRWIN  
7 MR. BRANDON HALL (via Zoom)  
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18  
19  
20 Also Present:  
21

22 MS. MARY CIEZADLO - Videographer

23 MR. DANIEL CORTEZ - General Counsel,  
Ramsey Solutions

24 MR. BRAD AMOS - (via Zoom)

1 your attorneys or anyone else. I'm sure your 02:24:40  
2 attorney told you that, so I just wanted to get it 02:24:43  
3 on the record. 02:24:45

4 I do want to show you a document. 02:24:45

5 MS. IRWIN: This is Bates stamped 02:24:50  
6 LAMPO 101. It's the handbook signed by Brad Amos. 02:24:51  
7 I can enter the entire thing as an exhibit. So it 02:24:57  
8 begins on LAMPO 98 and then goes through some number 02:24:59  
9 uncertain at this moment. 02:25:07

10 MS. SANDERS: Did you say it's the 02:25:11  
11 handbook signed by Brad Amos? 02:25:12

12 MS. IRWIN: Yeah. 02:25:14

13 MS. SANDERS: Okay. 02:25:14

14 MS. IRWIN: It's in the initial 02:25:15  
15 disclosures. 02:25:17

16 MS. SANDERS: Okay. Thank you. 02:25:17

17 MS. IRWIN: Uh-huh. 02:25:18

18 MS. SANDERS: Can you blow it up just a 02:25:21  
19 smidge? 02:25:24

20 MS. IRWIN: Yeah. 02:25:24

21 (WHEREUPON, a document was designated to 02:25:24  
22 be marked as Late-Filed Exhibit Number 15, when 02:25:24  
23 provided.) 02:25:27

24 BY MR. STREET: 02:25:27

25 Q. Now, Mr. Ramsey, is Lampo a Christian 02:25:27

1 company? 02:25:30

2 A. No. There's no such thing. Our -- no. 02:25:34

3 Q. Okay. Well, this is part of the employment 02:25:44

4 handbook given to employees, which says "The image 02:25:48

5 of Ramsey Solutions is held out to be Christian. 02:25:53

6 Should a team member engage in a behavior not 02:25:57

7 consistent with traditional Judeo-Christian values 02:25:59

8 or teaching, it would damage the issue [sic] and the 02:26:04

9 value of our goodwill and our brand. If this should 02:26:06

10 occur, the team member would be subject to review, 02:26:09

11 probation, or termination." 02:26:12

12 Do you see that? 02:26:13

13 A. Correct. 02:26:13

14 Q. And that is Lampo policy? 02:26:14

15 A. Correct. 02:26:16

16 Q. Okay. So how does that not make Lampo a 02:26:16

17 Christian company if it says "if you engage in 02:26:18

18 behavior not consistent with Christian values or 02:26:21

19 teaching, then" -- 02:26:24

20 A. I'm not sure how you define a Christian 02:26:25

21 company, but this is a brand issue. The vast 02:26:28

22 majority of our constituency, our customers are 02:26:35

23 people of faith, and they know I am, and they would 02:26:40

24 lose trust in me if people that worked for me were 02:26:45

25 not adhering to those values. So this is a brand 02:26:49